



# UNITED FISHERMEN OF ALASKA

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**Fishermen's Concerns Regarding Offshore Aquaculture  
Presented to Marine Fisheries Advisory Committee  
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United Fishermen of Alaska is the largest trade organization representing Alaska's commercial fishing industry. UFA represents 33 regional and gear-specific fishing organizations from all regions and fisheries in the state, including six non-profit aquaculture associations. Over 500 independent fishermen, crew and businesses also support UFA through individual, crew and business memberships.

Alaska's reputation for fisheries management, from our State Department of Fish and Game and the North Pacific Fishery Management Council is unsurpassed in the world and recognized in the PEW Commission and US Commission on Ocean Policy reports, as well as Marine Stewardship Certification of our salmon fishery. None of our fish stocks are currently listed as depleted. Our state-managed salmon fisheries made successful rebounds under state management after a period of abuse before statehood – so the concept of EEZ fish farms to “take pressure off” wild stocks is less important to Alaska fishermen than the market pressures we have experienced.

Fin fish farms were banned in Alaska in 1990. Governor Frank Murkowski has requested a five year moratorium on EEZ fish farms in coastal water off Alaska, while supporting research into related socio-economic impacts to fisheries-dependent communities (Alaska Comments on US Oceans Report, p 32).

Virtually all of UFA's Board of Directors, and Alaska's fishermen are actively engaged in commercial fishing and unable to attend the MAFAC meetings. It is impossible to convey the strong feelings that you would hear if you held public meetings to air fishermen's concerns.

#### MEMBER ORGANIZATIONS

Alaska Crab Coalition • Alaska Dragger's Association • Alaska Longline Fishermen's Association • Alaska Trollers Association  
Armstrong Keta • At-sea Processors Association • Bristol Bay Reserve • Concerned Area "M" Fishermen  
Cordova District Fishermen United • Crab Rationalization and Buyback Group • Douglas Island Pink and Chum • Fishing Vessel Owners Association  
Groundfish Forum • Kenai Peninsula Fishermen's Association • Kodiak Regional Aquaculture Association • Kodiak Seiners Association  
North Pacific Fisheries Association • North Pacific Scallop Cooperative • Northern Southeast Regional Aquaculture Association  
Old Harbor Fishermen's Association • Petersburg Vessel Owners Association • Prince William Sound Aquaculture Corporation  
Purse Seine Vessel Owner Association • Seafood Producers Cooperative • Southeast Alaska Herring Seiners Marketing Association  
Southeast Alaska Regional Dive Fisheries Association • Southeast Alaska Seiners Association  
Southern Southeast Regional Aquaculture Association • United Catcher Boats • United Salmon Association • United Southeast Alaska Gillnetters  
Valdez Fisheries Development Association • Western Gulf of Alaska Fishermen

UFA has a longstanding policy statement – we oppose fish farms. More recently, at its Spring 2004 meeting, the UFA Board adopted the following positions regarding offshore aquaculture:

- UFA supports a Legislative Environmental Impact Statement on legislation regarding EEZ Open Ocean fish farms.
- UFA opposes voluntary regulatory measures for aquaculture industry.
- UFA opposes exemption from Magnuson-Stevens, Jones Act and other applicable laws governing transportation and fisheries for aquaculture industry.

In addition to these official positions of the UFA Board, our office is familiar with a wide range of concerns from individual fishermen, who are not able to attend these meetings to provide input directly. In general, the following problems we foresee or currently suffer from fish farms do not appear to be reduced in the offshore environment.

#### **Market & Prices:**

Foreign farmed salmon production exceeding market capacity drastically reduced prices to fishermen, and even to the foreign fish farmers. This unstable market prevented new product development and decimated fishing fleets, and the communities dependent on them. Farmed finfish harvests should be managed in volumes and scheduled to timings that do not disrupt existing fisheries, processors and communities.

**Communities, Infrastructure and Transportation** – The potential of offshore aquaculture operations to bypass Alaska’s communities and fish landing tax revenue stream are a high concern. Aquaculture operations if pursued at all, should contribute to communities and to solving the transportation and infrastructure problems that hinder Alaska’s fishing industry, to the benefit of all Alaskans.

#### **Environment:**

**Contaminants** – Fishermen are concerned that industrial scale aquaculture will increase levels of contaminants in the waters surrounding fish farms and jeopardize our fisheries. Marketing efforts to differentiate Alaska wild salmon from farmed competition are beginning to reflect in prices to some of our salmon fishermen. Any increase of contaminants in ocean waters will be at the expense of Alaska’s reputation for purity and quality from a pristine environment. It is of no consolation that these contaminants will be much diluted, as any increase in contaminants due to fish farms in our waters puts our developing market niche at risk. The use of antibiotics in ocean pens raises concerns of the development of more resistant diseases as has occurred in humans. This and the apparent increase of sea lice near fish farms are of concern to fishermen.

**Invasive species** – Net pens are proven to be an unreliable barrier to the escape of farmed fish, and offshore weather will likely cause more problems than currently exist in

sheltered locations. 2,500 Atlantic salmon escaped last month from British Columbia, and Atlantic Salmon have been caught in Alaska waters. Fishermen are concerned about the unforeseeable impacts that non-native species will present to resident fish and ecosystems. The risk of intermingling or competition of genetically altered fish with healthy natural stocks puts the offshore farming of these “fish” completely out of the question. Though effective barriers to the escape of all fish seemingly could be developed, this will always remain a concern to Alaska fishermen, especially those in the Prince William Sound area where oil from the Exxon Valdez remains.

### **Interference with shift to ecosystem based management**

The U.S. Commission on Ocean Policy points toward a future of ecosystem based management. Yet this week we have the first outbreak of Vibrio bacteria in Kachemak Bay shellfish, and a second hypoxic dead zone in three years has formed in Oregon waters. Unexplained changes in marine mammal populations with increases in Southeast and declines in Western Alaska, and record warm and dry weather point to large scale climate changes that will pose challenges to scientists attempting to assess ecosystems. To add new variables of large aquaculture operations while the regime change of scientific ecosystem based management is being promoted reduces the chance of success for this implementation.

### **Ownership & Private Property Rights**

The establishment of leased or owned “real estate” rights in the EEZ presents impacts on navigation and common use of fishing grounds, and is an enormous fundamental change that fishermen - commercial and sport – will voice concern over.

The introduction of barbed wire and fencing of free rangeland led to gun battles, and eliminated the indigenous people and working cowboys in the Plains states - without referendum or the protection of Statehood. This is fundamentally as big a change to those directly affected. Alaska’s constitution assures reservation of fish and waters for the common use, and utilization and development for the maximum benefit of its people. Fishermen are concerned as to what rights States would retain in control and management of the surrounding waters that affect their communities.

### **Lack of data and regulations**

It is encouraging that MAFAC’s Aquaculture Advisory Committee in recognition of the high level of fear and misunderstanding, emphasized the urgent need for NOAA Fisheries to develop and disseminate its aquaculture policy. But it is of deep concern to fishermen that rumors continue of “draft legislation” and “draft business model” outside public view. Fishermen are concerned that major changes that will directly affect them are being planned and pushed without open public input and scrutiny in the process.

### **Aquaculture that is working in Alaska**

Alaska’s fishermen have examples of aquaculture that is working for them. Our salmon enhancement hatcheries, funded by fishermen through aquaculture associations, have produced a steady supply of salmon to augment wild returns. Our expanding shellfish mariculture is growing and is now benefiting from live delivery prices through changes to

testing facilities and regulations. At the heart of both of these successes is local control with the cooperation and involvement of fishermen and communities.

In summary, these fishermen's concerns can be translated into recommendations:

- Food Safety and wholesomeness -eliminate risks to our existing fish stocks as well as farmed fish products – any tainted seafood hurts all.
- Price and markets - manage to fit in rather than threaten existing fishery markets and production.
- Lack of hard regulation, implementation, monitoring, and enforcement of farmed industry worldwide. Manage U.S. aquaculture under existing regulatory frameworks for sustainability.
- Lack of data – Baseline science is needed first in ecosystem based management. Adequately fund and implement meaningful, prioritized, research before implementing major new activities.
- Eliminate risk to wild fish stocks and the local environment.
- Implement transportation and infrastructure that benefits local communities.
- Implement with regard for state's and public rights and process.
- Implement trade policies that allow for a level playing field for US producers and help support responsible resource development.
- Avoid agency advocacy for any sector over others.
- Develop not just voluntary codes of conduct and policy, but hard regulations for the fish farm industry – then enforce them.
- Closed containment and treatment of effluent.
- 100 percent marked fish, by farm, with substantial investment in tag recovery and analysis programs.
- Provide a transparent public process to engage affected public and improve communication between all parties (e.g. local and regional councils, fishery management Councils, IPHC, Board of Fisheries, Alaska Natives, Tribes, First Nations, sport and commercial organizations, etc).